

IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF WISCONSIN

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THE ESTATE OF TONYA K. MEALMAN,

*Plaintiff,*

Case No. 21-CV-820

v.

WISCONSIN MUNICIPAL MUTUAL INS. CO., et al.,

*Defendants.*

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**DECLARATION OF JOHN H. BRADLEY**

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I, John H. Bradley, declare and state that:

1. I am one of the attorneys of record representing the Plaintiff in the above-captioned case and I make this declaration based on personal knowledge.

2. Attached as **Exhibit A** is a notice provided to the Brown County defendants pursuant to Fed. R. Civ. Pro. 34(a)(1), requesting to inspect electronically stored information within the ERMA program and OMS program at the Brown County Jail.

3. Attached as **Exhibit B** is a letter from counsel for the Brown County defendants denying Plaintiff's request to inspect the Brown County OMS system.

4. Brown County defendants have subsequently denied Plaintiff's above request to inspect both the ERMA program and OMS program at the Brown County Jail.

5. Wellpath defendants initially did not object to Plaintiff inspecting the ERMA system, but have subsequently stated that they will adopt the position of the Brown County defendants regarding Plaintiff's request to inspect the ERMA system.

6. Counsel for the Plaintiff informed counsel for Brown County defendants that they would file a motion to compel to inspect the OMS and ERMA systems.

7. Attached as **Exhibit C** is a true and correct copy of the deposition transcript of Dalton Desmond taken on August 9, 2022.

8. Attached as **Exhibit D** is a true and correct copy of the deposition transcript of Emily Blozinski taken on October 4, 2022.

9. Attached as **Exhibit E** is a true and correct copy of the deposition transcript of Atalie Przybelski Vol. I taken on September 26, 2022.

10. Attached as **Exhibit F** is a true and correct copy of the deposition transcript of Dirk Larson taken on October 3, 2022.

11. Attached as **Exhibit G** is a true and correct copy of the deposition transcript of Jeffrey Rhodes taken on September 27, 2022.

12. Attached as **Exhibit H** is a true and correct copy of the deposition transcript of Kelly Delwiche taken on September 28, 2022.

13. Attached as **Exhibit I** is a true and correct copy of the deposition transcript of Chris Patterson taken on September 29, 2022.

14. Attached as **Exhibit J** is a true and correct copy of the deposition transcript of David Niemierowicz taken on September 29, 2022.

15. Attached as **Exhibit K** is a true and correct copy of the deposition transcript of Jessica Dennisen taken on October 11, 2022.

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the foregoing is true and correct.

Executed on: December 1, 2022,

/s/ John H. Bradley  
John H. Bradley